

PERMIT CONDITIONS
GREAT WESTERN PUBLISHING INC
Permit Number 96-0650
August 22, 1996 (Revised)

The numerical section references in this Permit are based on Maricopa County Air Pollution Control Rules and Regulations (Rules) in effect on the date of issuance of these Permit Conditions. In the event that these rules are revised to change the numerical references during the term of this Permit, the revised numbering system will apply to this permit.

GENERAL CONDITIONS:

1. **Annual Compliance Certification:** The Permittee shall file an annual compliance certification with the Maricopa County Department of Environmental Services (Department), Attn: Air Quality Compliance Supervisor. The compliance certification shall be filed on a form and in the manner specified by the Maricopa County Air Pollution Control Officer (Control Officer).
2. **Certification:** Any document which is required to be submitted by this Permit or the Rules shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
3. **Controls:** Except as provided by the applicable Rules or these Permit Conditions, the Permittee shall not operate any equipment or process unless air pollution controls, required by either this Permit or the Rules, are in place, are operating without bypass, and are operating within their design parameters and in accordance with any other conditions specified in this Permit. This requirement to operate any required air pollution control equipment may be temporarily waived:
 - a. for good cause if advanced written approval is obtained from the Control Officer, or
 - b. for preventative maintenance of the control device if the shutdown is allowed in the control's Operation and Maintenance Plan which has been approved in writing by the Control Officer.

The Permittee shall notify the Control Officer, in accordance with Rule 220, before making any additions, modifications or replacements to any air pollution control equipment. This notification requirement does not apply to normal maintenance and repair activities.

4. **Fees:** The Permittee shall pay, in a timely manner, an annual fee for this Permit as determined by the Control Officer in accordance with Rule 280.
5. **Fugitive Dust:** The Permittee shall take all reasonable precautions to minimize the emissions of fugitive dust in accordance with §300 of Rule 310.

6. **Leased/Rented/Borrowed Equipment:** If the Permittee leases, rents, or lends any equipment covered by this permit to a second party, the Permittee shall provide the second party with a copy of this Permit. It is the responsibility of the person using the equipment to make sure that the equipment is properly permitted and operated. If the Permittee does not provide the second party with a copy of this Permit, both the Permittee and the second party shall be responsible for operating the source in compliance with the Permit and for any violation thereof.
7. **Maintenance:** The Permittee shall keep all equipment under this Permit in good working order through an active maintenance program established in accordance with the approved Operation and Maintenance Plans or, in its absence, with manufacturers' recommendations, and generally accepted industry standards.
8. **Malfunctions (Emergency Upsets):** A malfunction that causes emissions in excess of those allowable by either the Rules or these Permit Conditions shall constitute a violation. Any affirmative defense of a violation caused by a malfunction shall be documented in accordance with §501 of Rule 100.
9. **Material Containment:** Materials including, but not limited to, solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizer and manure shall be processed, stored, used and transported in such a manner and by such means that they will not unreasonably evaporate, leak, escape or be otherwise discharged into the ambient air so as to cause or contribute to air pollution.
10. **Modifications:** The Permittee shall notify the Control Officer, in accordance with the Rules, of changes, replacements or additions to the source which are not covered by this Permit.
11. **Odors:** The Permittee shall not emit gaseous or odorous air contaminants from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.
12. **Operations:** The Permittee shall operate all equipment and processes in accordance with these Permit Conditions, applicable approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.

The Permittee shall halt or reduce activities if necessary in order to maintain compliance with these Permit Conditions, all approved operations and maintenance plans, and all applicable requirements of Federal laws, Arizona laws, and Maricopa County Air Pollution Control Rules and Regulations.

13. **Portable Sources:** If this Permit is for a portable source, the Permittee shall notify this Department, Attn: Air Quality Compliance Supervisor, in writing at least ten days

in advance of moving to any location in Maricopa County. The notification shall include, at a minimum, the information required by §410 of Rule 200.

If the proposed location will have additional sources of air pollution under the control of the Permittee, the notification shall also contain a summary of the projected and allowable emissions for these additional sources.

The ten day notification requirement may be waived if both of the following conditions are met:

- a. the Permittee can demonstrate to the satisfaction of the Control Officer that an emergency situation existed, and
- b. the Permittee notifies the Department of the required information by telephone as soon as is practical and follows up with a written copy within seven days.

The Permittee shall submit any fees required by Rule 280 at the time that the notification is filed.

If the Permittee obtains an air quality permit from the Arizona Department of Environmental Quality (ADEQ) for any source covered by this Permit, the Permittee shall provide a copy of the ADEQ permit to the Department within 30 days of its issue.

14. **Record Keeping:** The Permittee shall maintain accurate records as required by these Permit Conditions and by Section 500 of all applicable Rules. These records will be kept in a form which allows easy verification of compliance with these Permit Conditions and any applicable Rules.

All records shall be kept for a minimum of three years except that all records required to demonstrate that an air pollution control device is being operated properly shall be retained for five years.

All records required by this Permit shall be made available for inspection upon request by a representative of the Control Officer.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this permit.

15. **Renewal:** The Permittee shall file an application for a permit renewal at least six months, but not more than 18 months, before the expiration date of this Permit.
16. **Reopening For Cause:** This Permit shall be reopened or revised prior to expiration under any of the following conditions:

- a. either the Control Officer or the Administrator of the United States Environmental Protection Agency (Administrator) determines that this Permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of this Permit, or
 - b. either the Control Officer or Administrator determines that this Permit must be revised or revoked to assure compliance with the applicable requirements.
17. **Reporting:** If notified, the Permittee shall submit an annual emissions inventory report to the Control Officer. The report shall summarize the activities and air pollution emissions from the facility during the previous calendar year in accordance with §507 of Rule 100. The report shall be filed on a form supplied by the Control Officer and shall be due by April 30 or 90 days after the Control Officer makes the forms available, whichever is later.

The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising or revoking and reissuing this Permit or to determine compliance with this Permit.

Upon request, the Permittee shall furnish to the Control Officer copies of records required to be kept by this Permit.

The Permittee shall file any additional reports required by the Control Officer in a complete and timely manner.

18. **Right to Entry:** The authorized representative of the Control Officer, upon presentation of credentials, shall be permitted:
- a. to enter upon the premises where the source is located or emissions-related activity is conducted, or in which any records are required to be kept under the terms and conditions of this Permit, and
 - b. to have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this Permit, and
 - c. to inspect any source, at reasonable times, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required in this Permit, and
 - d. to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this Permit or other applicable requirements, and
 - e. to record any inspection by use of written, electronic, magnetic, and photographic media.

No claim of confidentiality for trade secrets or commercial information available to the Permittee under Arizona Revised Statutes (ARS) 49-487 or Rule 200 §400 can limit

the scope of or otherwise interfere with an on-site inspection by a representative of the Control Officer.

19. **Rights and Privileges:** This Permit does not convey any property rights nor exclusive privileges of any sort.
20. **Severability:** The provisions of this Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.
21. **Start-up Notification:** The Permittee shall give written notification to the Department, Attention Compliance Supervisor, at least 7 days but no more than 30 days before the initial start-up of any new equipment or process. Start-up shall be defined as the use of any equipment or process covered by this Permit in a manner that emits or controls a regulated air pollutant. However, startup shall not be considered as having occurred if the equipment or process is operated solely for the purpose of calibration or test runs.

This startup notification does not apply to processes or equipment recognized by the Control Officer as being trivial or insignificant activities.

22. **Temporary Equipment:** The Permittee shall notify the Control Officer and obtain appropriate approval, in accordance with the Rules, prior to the installation or operation of any temporary or contractor operated equipment not covered by this Permit.

SPECIFIC CONDITIONS:

23. **Allowable Emissions:** The Permittee shall not allow emissions into the atmosphere in excess of any of the following:

	Daily Emission Limits	Twelve Month Rolling Average Emission Limits
Carbon Monoxide (CO)	14 pounds	2.5 tons
Total Hazardous Air Pollutants	3 pounds	1095 pounds
Oxides Of Nitrogen (NO _x)	55 pounds	10 tons
Particulates Smaller Than 10 Microns (PM ₁₀)	3 pounds	1095 pounds
Particulates	3 pounds	1095 pounds
Total Volatile Organic Compounds (VOCs)	268 pounds	49 tons

The twelve month rolling average shall be calculated at the end of each calendar month by summing the emissions over the most recent twelve calendar months.

24. **Control Device Parameters for the Thermal Oxidizer**

- a. The Heatset Lithographic Printing Presses shall be operated with a thermal oxidizer at an operating temperature of at least 1400 °F. If a lower temperature is to be used, the Permittee shall first demonstrate through testing that the lower temperature produces at least a 90% VOC destruction efficiency by weight with a carbon monoxide concentration of less than 100 parts per million (ppm) by volume at the outlet.
- b. The Heatset Lithographic Printing Presses shall not be operated unless both the thermal oxidizer and its temperature recorder are in service and operating within the design parameters.
- c. The Thermal Oxidizer shall not be by passed unless the total of all VOCs released into the atmosphere is three pounds per day or less.

25. **Operating and Maintenance Plan (O&M)**

The Permittee shall submit an approvable O&M plan for the Thermal Oxidizer in accordance with the Department guidelines to the Department for review, within 60 days upon issuance of the permit or at least 30 days prior to the startup of any new control device.

The O&M Plan for the foregoing equipment shall include requirements for training employees who are responsible for operating or maintaining the listed equipment.

As part of the O&M Plan, the Permittee shall establish the appropriate ranges for the key operating parameters for the listed equipment. The Permittee shall monitor, operate and maintain the process equipment in accordance with the approved O&M Plan, to ensure that the emissions limitations of these permits are not exceeded.

26. **Monitoring;** The Permittee shall monitor the alcohol concentration of each fountain solution source (if used) containing any alcohol with a refractometer, a hydrometer or a conductivity meter. The instrument shall have a visual readout (analog or digital) with an accuracy of either ± 2 percent of the meter's full scale, or ± 0.5 percent absolute (such as for meter readings given in percent.)
27. **VOC Limitations:** The Permittee shall not apply any inks, or press applied varnishes, coatings, or adhesives unless the VOC content as applied is equal to or less than 2.5 pounds per gallon (300 grams per liter), less water and non-precursor organic compounds.

A. Lithographic Printing Only: The Permittee may comply with the above provision by using an Emission Control System (ECS) with a control device efficiency which reduces the VOC emissions from the dryer exhaust vent by at least 90 percent by weight if the following additional two conditions are met:

(1) The dryer pressure shall be maintained lower than the press room air pressure such that air flows into the dryer at all times when the press is operating, (2) has a differential pressure monitor with audible and visible alarm which annunciates whenever the pressure in the dryer equals or exceeds the pressure in the press room.

B. All Other Types of Non-Lithographic Printing: The Permittee may comply with the above provision by using an ECS which reduces the VOC emissions from the dryer exhaust vent by at least 90 percent by weight, and an overall capture and control efficiency of at least 65 percent by weight.

C. Offset Lithographic Printing Only:

1. Fountain Solution VOC Limits: After March 27, 1997, the Permittee shall limit the combined total volume of alcohol, alcohol substitute, and any other VOC in each fountain solution source to the limits in Rule 337 §302 column A of Table 1 whenever the press is on; except that a fountain solution source refrigerated below 60°F and having a properly indicating temperature monitor is subject to the limits in column B of Table I.

2. Cleaning Solutions: The Permittee shall use cleaning solutions with a vapor pressure at 20°C compliant with the standards in Rule 337 §303 Table 2.

28. Operations & Maintenance:

A. Should an Emission Control System be used to comply with the limits of Permit Condition 27, the Permittee shall install, maintain, and calibrate monitoring devices described in an Operations and Maintenance Plan (O&M). The monitoring devices shall measure temperatures, pressures, rates of flow, or other operating conditions necessary to determine if air pollution control equipment is functioning properly.

B. The Permittee shall provide the Department with an O&M Plan for an ECS system used to comply with Permit Condition 25a or 25b. This plan shall specify key system operating parameters, such as temperatures, pressures and/or flow rates, necessary to determine compliance with this rule, and describe in detail procedures to maintain the ECS. The Department's written

approval of this plan and the implementation of this plan shall be required for compliance.

29. **Record Keeping:** The Permittee shall maintain the following lists and records in a consistent and complete manner:

A. **Current List:** A current list of inks, coatings, adhesives, thinners, cleaners, and any other VOC-containing materials used at the facility; state the VOC content of each in pounds per gallon or grams per liter

B. **Additional Record Keeping Requirements for Offset Lithographic Printing:**

1. **Current List:** A current list of fountain solutions, alcohol(s) and alcohol substitutes used at the facility; state the VOC content of each in pounds per gallon or grams per liter. In addition, for each blanket wash and other cleaning solutions, list the VOC vapor pressure at 20°C (68°F).

2. **Weekly Entry of Monitoring Data If Any Alcohol Is Used:**

a) A weekly entry shall be made of the results of an instrument reading, required by permit condition 25.c.1, for each fountain solution source containing any alcohol; and

b) Weekly, for each fountain solution source, record the names and the most current mixing ratio of all alcohol, alcohol-substitutes, and water used in making fountain solution in that source.

3. **Monthly Entries for Presses Which Never Use Any Alcohol:** Monthly, record the names of all alcohol-substitutes and the mixing ratio of all alcohol-substitutes to water, for each fountain solution source on a press which never uses alcohol.

C. **Additional requirements for ECS operations:**

1. **Usage Records of Graphic Arts Materials and Cleaning Solutions:** Daily, the Permittee shall update the records showing the type and amount of each graphic-arts ink, varnish, coating, adhesive, fountain solution, blanket wash, and all other cleaning solutions used on the press. However, the Permittee may maintain monthly records of materials by complying with Permit Condition 25 VOC limits or Permit Condition 25.c.2 vapor pressure limits, if each material served by a control device is identified as such.

2. **For ECS Operation and Maintenance, the Permittee shall:**

a) maintain a continuous record of the times an ECS is used to comply with these permit conditions, and

- b) maintain daily records of the O&M Plan's key system operating parameters, and
- c) maintain records of all maintenance performed according to the O&M Plan.

30. **Testing:** The Permittee shall conduct an emissions test on the thermal oxidizer for VOC destruction efficiency within 90 days upon the issuance of the permit. This time frame may be extended by the Control Officer for good cause, but in no case shall the testing period extend for more than 180 days upon the issuance of the permit. Testing for the thermal oxidizer shall demonstrate a 90% destruction efficiency by weight for VOCs and the CO emissions to be less than 100 parts per million by volume (ppmv) at the outlet. The testing shall be conducted in accordance with USEPA approved test procedures.

The Permittee shall submit a test protocol to the Department for review and approval at least 30 days prior to the emissions test. A fee for each stack to be tested, as required by Rule 280, shall be submitted with the test protocol.

The Permittee shall notify the Department in writing at least two weeks in advance of the actual time and date of the emissions test so that the Department may have a representative attend.

The Permittee shall complete and submit a report to the Department within 30 days after completion of the emissions test. The report shall summarize the results of the testing in sufficient detail to allow a compliance determination to be made.

31. **Cleanup and VOC Containment:** Cover all VOC containing materials used for cleaning and cleanup, including rags and towels, when not in use. Store all VOC containing materials used for cleaning and clean up, including rags and towels in closed containers.

The following permit conditions apply to the cold cleaners

32. The cold cleaners with remote reservoir shall be equipped with the following:
- a. A sink like work area which is slopped sufficiently towards the drain to prevent pooling of the solvent.
 - b. A single drain opening or cluster of openings served by a single drain for the solvent to flow from the sink into the enclosed reservoir. Such openings shall be contained within a contiguous area not larger than 15.5 square inches (100 cm²).

***GREAT WESTERN PUBLISHING INC. PERMIT NO. 96-0650
PERMIT CONDITIONS, 08/22/96, REVISED***

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